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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TINA CHEN,  
aka "Ya When Chen,"  
aka "Wen Tina Chen,"  
aka "Tina Dunbar,"  
aka "Tina Dubner,"

Defendant.

No. 2:21-cr-139-APG-BNW

**Stipulation to Continue Response Deadline  
to Motion for Compassionate Release (ECF  
No. 72) (First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Jessica Oliva, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Aden Kebede, Assistant Federal Public Defender, counsel for Tina Chen, that the

1 response deadline of November 27, 2023 to Defendant Chen's Motion for Compassionate  
2 Release (ECF No. 72) be continued by one week to December 4, 2023. This stipulation is  
3 entered into for the following reasons:

4 1. On November 20, 2023, Defendant Chen filed a Motion for Compassionate  
5 Release ("Motion") under the First Step Act. ECF No. 72.

6 2. Under the Court's Amended General Order 2020-06, the United States  
7 Attorney's Office must file a response within seven days of the Federal Public Defender's  
8 Office filing a motion pursuant to Section 603(b) of the First Step Act. The government's  
9 deadline to respond is thus November 27, 2023.

10 3. The undersigned government attorney will be out of the office on November  
11 23, November 24, and part of November 22, 2023, and thus requires additional time to  
12 respond to Chen's Motion.

13 4. The parties agree to continue the Government's deadline to respond to  
14 Chen's Motion by one week, to December 4, 2023.

15 5. This continuance is sought not for purposes of delay, but merely to allow the  
16 government sufficient time to respond to Chen's Motion.

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6. This is the parties' first request to continue this response deadline.

Respectfully submitted this 21st day of November, 2023.

RENE L. VALLADARES  
Federal Public Defender

/s/ Aden Kebede  
ADEN KEBEDE  
Assistant Federal Public Defender  
Counsel to Defendant TINA CHEN


JASON M. FRIERSON  
United States Attorney

/s/ Jessica Oliva  
JESSICA OLIVA  
Assistant United States Attorney

MATTHEW G. OLSEN  
Assistant Attorney General  
National Security Division

/s/ Matthew J. McKenzie  
MATTHEW J. MCKENZIE  
Deputy Chief

IT IS SO ORDERED.

  
HONORABLE ANDREW P. GORDON  
U.S. DISTRICT COURT JUDGE

DATED: November 28, 2023